

January 6, 2011

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554



Re: Notice of *Ex Parte* Presentation
WC Docket No. 10-90 (Connect America Fund)
WT Docket No. 10-208 (Mobility Fund)
GN Docket 09-51 (National Broadband Plan)
WC Docket No. 06-122 (USF Contribution Methodology)
WC Docket No. 05-337 (High-Cost Universal Service Support)
WC Docket No. 03-109 (Lifeline and Link Up)

Dear Ms. Dortch:

On Wednesday, January 5, 2011, and Thursday, January 6, 2011, representatives of several civil rights, media reform, and public interest organizations (collectively, the "Public Interest Representatives") met separately with Zac Katz, Legal Advisor for Wireline Communications, International and Internet Issues to Chairman Julius Genachowski; Margaret McCarthy, Policy Advisor, Wireline, for Commissioner Michael J. Copps; and Angela Kronenberg, Wireline Legal Advisor to Commissioner Mignon Clyburn. Each meeting consisted of discussions regarding potential reforms to Universal Service Fund ("USF") mechanisms, as contemplated in an array of ongoing and upcoming Commission proceedings.

The Public Interest Representatives attending some or all of these meetings included Chris Calabrese, American Civil Liberties Union; Amina Fazlullah, Benton Foundation; Parul Desai, Consumers Union; Corrine Yu, Leadership Conference on Civil and Human Rights; Beth McConnell and Rachel Colyer, Media and Democracy Coalition; Matt Wood, Media Access Project, as counsel to the Media Action Grassroots Network; Michael Calabrese, New America Foundation; John Bergmayer, Public Knowledge; and Cheryl Leanza, United Church of Christ OC Inc. Chris Calabrese and Cheryl Leanza also attended in their capacity as co-chairs of the Leadership Conference's Media/Telecommunications Task Force.

During these meetings, the Public Interest Representatives focused their comments on four general areas within the broad range of issues potentially to be dealt with in these expansive and comprehensive USF reform proceedings.

1. **Broadband as a Universal Service.** The Public Interest Representatives repeated the point (which they have made, individually and collectively in filings in the above-captioned dockets and elsewhere) that broadband is the essential telecommunications platform of the 21st Century, and thus should be considered a universal service. This means that broadband-capable facilities and broadband services should be not only permitted, but required of providers receiving support from the Connect America

Fund, or from any other subsequent iteration of or successor to the current high-cost mechanisms; and also that adoption support should be available for broadband service provided to low-income individuals. The Public Interest Representatives acknowledged that the Commission will need to make several choices in order to balance various priorities during the transition to a broadband-oriented fund. Nevertheless, the Commission cannot shy away from making these decisions necessary to modernize and revitalize USF.

2. **Lifeline/Linkup Expansion and Modernization.** The Public Interest Representatives indicated that the Commission generally should proceed along the lines suggested in the Joint Board's most recent recommended decision on Lifeline and Link Up, and should do so expeditiously. While the Commission may focus also in the immediate near-term on Notices of Proposed Rulemaking in other USF dockets, revisions to these critically important adoption support programs cannot be left to linger. The Public Interest Representatives reiterated their support for expanded eligibility measures and other reforms, though modified in some respects from the Recommended Decision conclusions in the ways suggested by their organizations' respective filed comments. They also encouraged the Commission to move ahead with pilot programs to facilitate broadband adoption by low-income individuals, and cautioned against potential pitfalls in creation of any national database – noting that, if not carefully designed and safeguarded, such a database could dampen enrollment by verifiable and fully eligible beneficiaries.
3. **Creation of the Connect America Fund and High-Cost Fund Reform.** While most of the Public Interest Representatives' organizations have reserved comment on high-cost fund reform and creation of the Connect America Fund to this point, they expressed their eagerness to continue and broaden their engagement on these issues as the Commission develops and proposes concrete rule changes. The Public Interest Representatives agreed that there are several paths the Commission could take to reform current mechanisms, in order to improve the accountability, efficiency, and usefulness of the fund. Yet, they explained that changes to distribution and contribution methodologies must neither discourage broadband adoption by unduly increasing the contribution burden on consumers, nor improperly limit the choice and quality of service available to residents of unserved and underserved areas.
4. **Mobility Fund Issues.** Finally, the Public Interest Representatives briefly presented very general views on the ongoing Mobility Fund proceeding, indicating that some number of the organizations they represent intend to file reply comments in that docket this month. During these meetings, they expressed some reservations about reverse auction mechanisms that might encourage a "race to the bottom" approach or provide no support for ongoing mobile wireless service operations.

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We submit this letter to the Secretary's office today pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b). Please contact the undersigned should you have any questions regarding this notification.

Respectfully submitted,

/s/ Matthew F. Wood

Matthew F. Wood
Associate Director
Media Access Project

cc: Zac Katz
Margaret McCarthy
Angela Kronenberg